

UNITED STATES DISTRICT COURT
 for the
WESTERN District of **TEXAS**

FILED
 February 20, 2025
 CLERK, U.S. DISTRICT COURT
 WESTERN DISTRICT OF TEXAS

United States of America

v.

Anthony Ayala

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)

Case No.

BY: **AB**

DEPUTY

SA:25-MJ-247

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 20, 2025 in the county of Bexar in the
 Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC § 922(g)(1)

Felon in Possession of a Firearm.

Penalties: Up to 15 Years Imprisonment; \$250,000 Fine; 3 Years Supervised Release; and \$100 Mandatory Special Assessment.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

HUNTER
 WESTBROOK
 (Affiliate)

Digitally signed by HUNTER
 WESTBROOK (Affiliate)
 Date: 2025.02.20 16:33:59
 -06'00'

Complainant's signature

TFO Hunter Westbrook, DEA

Printed name and title

- Sworn to before me and signed in my presence.
 Sworn to telephonically and signed electronically.

Date: February 20, 2025

City and state: San Antonio, Texas

Elizabeth S. Chestney, U.S. Magistrate Judge

Printed name and title



Judge's signature

AYALA, Anthony, H/M, DOB: 10-23-1979

US V AYALA, Anthony

1. I am a Police Officer with the University of Texas San Antonio Police Department where I have been commissioned for approximately nine years. I have been a Texas Peace officer since 2012 and have been assigned to the DEA, San Antonio District Office located in San Antonio, Texas since January 2017. I am currently assigned as a Task Force Officer to the DEA San Antonio District Office in San Antonio, Texas. I have participated in numerous narcotics investigations. I am familiar with the ways in which drug traffickers conduct their business, including, but not limited to, their methods of importing, concealing, packaging, diluting (cutting) and distributing controlled substances, their use of cellular telephone and short message service (SMS) / text message, and their use of code words to conduct their illegal activities. I know how drug traffickers collect, transport, secrete and launder proceeds derived from drug distribution. I am familiar with the documents generated through all of these illegal activities. I have executed numerous search warrants in my career.
2. On January 28, 2025, San Antonio Police Officers attempted a traffic stop on a black in color Toyota Tundra, bearing TXLPB663838, that was driven by Anthony AYALA, an individual under investigation for methamphetamine distribution, for a traffic violation. Upon initiation of the traffic stop, AYALA fled from officers in the Toyota Tundra and subsequently struck two parked vehicles, before successfully evading law enforcement. On February 18, 2025, your affiant applied for and was granted a Felony Arrest Warrant for Evading Arrest/Detention W/Vehicle and two (2) Misdemeanor Arrest Warrants for

Collision Causing Damage over \$200.00, for AYALA for his involvement in the evading that occurred on January 28, 2025.

3. On February 20, 2025, Agents located the Toyota Tundra that AYALA previously evaded law enforcement in, now bearing TXLP-8729M53, and a second vehicle known to be utilized by AYALA, a gold in color Chevrolet Tahoe, bearing TXLP-RLH4395, to be parked at 4801 Gus Eckert #112, San Antonio, TX, an address known to be utilized by AYALA. Agents contacted management and confirmed that AYALA was a resident of the apartment complex, was listed on the lease agreement for apartment #112, and was known to management due to multiple issues that have occurred between AYALA and management. Based on the confirmed lease agreement listing the 4801 Gus Eckert #112, San Antonio, TX as AYALA's residence, the two vehicles known to be utilized by AYALA being at the address, and statements that management of the complex knew AYALA, Agents contacted the United States Marshals Service Fugitive Taskforce for assistance.
4. On February 20, 2025, at approximately 11:15 am, the USMS Fugitive Task Force executed the three (3) active arrest warrants for AYALA at 4801 Gus Eckert #112 San Antonio, TX and took AYALA into custody without incident. During the execution of the arrest warrant, AYALA was located on the couch inside the living room. AYALA was found to be the only person within in the residence at the time of his arrest. While executing the arrest warrant, USMS Deputies observed a Glock handgun to be sitting in plain view on the couch, the same couch where AYALA was located at the time of his arrest.
5. Your affiant knows AYALA is a convicted felon with the following State of Texas Convictions: Deadly Conduct Discharge Firearm Individuals on March 31, 2011, in Bexar

County, TX, and Burglary of a Habitation on March 31, 2011, in Bexar County, TX. Your Affiant is also aware that AYALA is on Texas Parole for a prior felony conviction until March of 2025, meaning AYALA is also aware he is a convicted felon. Since AYALA is a convicted felon, your Affiant applied for and was granted a State of Texas search warrant, 2025W00777, for 4801 Gus Eckert #112, San Antonio, TX, so that the firearm that was observed in plain view could be recovered. The State of Texas search warrant also include the two vehicles that belong to AYALA, the gold Tahoe and black Tundra.

6. Upon authorization of the search warrant, Agents entered the residence and began searching. During the search Agents recovered a Glock 43X, bearing serial number BZWV490, from the couch that AYALA was encountered on, which was originally observed in plain view. Agents also located a black zipper bag in front of the couch that AYALA was encountered on that contained the following: Smith & Wesson Bodyguard 380 with an obliterated serial number, a Palmetto Arms Ar15 short barrel rifle with serial number SCD308966, and a Springfield Arms XD handgun bearing serial number XD559672. Agents located in the bedroom closet in a shoe box a Glock 23 that was modified with a “Glock Switch,” bearing serial number ALL471. Agents located a Marlin 22 rifle with serial number unknown on the back porch of the residence. Agents also recovered various items of drug paraphernalia throughout the residence, a black backpack that was in front of the couch next to the bag that contained the firearms that contained approximately six (6) ounces of methamphetamine, and a small twist top bag in a kitchen drawer that contained fraudulent M30 pills that are believed to contain fentanyl.
7. During the search of the Tahoe Agents recovered a Smith & Wesson AR15 bearing serial number TL03377, which is reported stolen out of Kerr County, TX, and various items that

are suspected of being stolen property. Agents also found an ID card that contained AYALA's name inside the Tahoe and mechanic receipts with AYALA's name.

8. During the search of the Tundra, Agents located a Cricket 22 rifle with no firing pin in the toolbox of the truck, and a small bag containing approximately three (3) grams of methamphetamine in the center console of the Tundra.
9. Agents seized all items located as evidence. Your affiant is aware that AYALA is prohibited from owning or possessing firearms due to him being a felon. Additionally, all firearms recovered from AYALA's residence are manufactured outside the State of Texas.
10. Your affiant attempted to conduct a Post Miranda Interview of AYALA. During this interview AYALA admitted to distributing small amounts of narcotics but claimed ignorance of all firearms that were located, to include the one that was on the couch, that was in plain view upon entry to the residence. AYALA did state that he resided at the residence, but he slept on the couch, the same couch where the Glock 43x was located and the same couch that was directly next to the bag containing the multiple firearms and the bag containing the methamphetamine. AYALA was booked into the Bexar County Jail without incident for his three active arrest warrants.

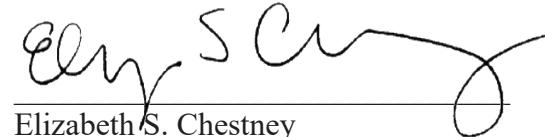
Based on the above, there is probable cause that ANTHONY AYALA committed the crime of Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1).

HUNTER
WESTBROOK
(Affiliate)

Digitally signed by HUNTER
WESTBROOK (Affiliate)
Date: 2025.02.20 16:34:29
-06'00'

Hunter Westbrook, Task Force Officer
Drug Enforcement Administration

Subscribed and sworn to telephonically on February 20, 2025


Elizabeth S. Chestney
United States Magistrate Judge